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7 Attorney for Jose Jesus Gomez-Cabrera

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JOSE JESUS GOMEZ-CABRERA,
15 Defendant.

Case No. 2:14-cr-072-KJD-VCF

**UNOPPOSED MOTION TO
CONTINUE SELF SURRENDER
DATE**

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17 Comes now the defendant, Jose Jesus Gomez-Cabrera, by and through his counsel of
18 record, Raquel Lazo, Assistant Federal Public Defender, and hereby moves this court for an
19 order to continue his self surrender date for sixty (60) days. This motion is supported by the
20 following Memorandum of Points and Authorities.

21 DATED this 8th day of October, 2015.

22 RENE L. VALLADARES
23 Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO
Assistant Federal Public Defender
26 Attorney for Jose Jesus Gomez-Cabrera

MEMORANDUM OF POINTS AND AUTHORITIES

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2 1. Mr. Gomez has been designated to his BOP facility. He is required to voluntarily
3 surrender on November 6, 2015, before 12:00 p.m.

4 2. Mr. Gomez seeks a continuance of his surrender date for several reasons. First,
5 he asks this court to respectfully consider a release date after the holidays. This will be his son's
6 first Thanksgiving and Christmas. Secondly, he would like additional time to get his financial
7 affairs in order as he prepares to leave his wife (who is currently unemployed), teenage
8 daughter, and two small children behind. Finally, he has been consulting with an immigration
9 attorney regarding an imminent ICE detainer once he surrenders. Undersigned counsel can
10 confirm this as she too has been in contact with the attorney. Mr. Gomez and his immigration
11 attorney would request additional time to continue to consult before he surrenders as it will be
12 easier to do so with Mr. Gomez out of custody.

13 3. Mr. Gomez' Pretrial Services Officer, Sandra Bustos, has no opposition. Mr.
14 Gomez is in full compliance.

15 4. The government also has no opposition.

16 DATED this 8th day of October, 2015.

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18 RENE L. VALLADARES
Federal Public Defender

19 /s/ Raquel Lazo

20 By: _____
21 RAQUEL LAZO,
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JOSE JESUS GOMEZ-CABRERA,
8

9 Defendant.

Case No. 2:14-cr-072-KJD-VCF

ORDER

10 IT IS HEREBY ORDERED that Defendant Jose Jesus Gomez-Cabrera, have his self
11 surrender day continued to January 8, 2016.

12 DATED this 19th day of October, 2015.

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15 UNITED STATES DISTRICT JUDGE
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